

Pre-merger Notification Office Bureau of Competition Room 303 Federal Trade Commission Washington, D.C. 20580

Re: Pre-merger Notification

Merger of (

Dear Federal Trade Commission:

This letter is submitted with respect to the merger of These two credit unions have their principal places of business in

By way of background, a credit union is a not-for-profit cooperative without capital stock. Credit union members exercise voting rights based on a "one-member, one vote" principle. Upon completion of the merger, the members of the share accounts of these members will have the same balance after the merger as before. In applying the FTC pre-notification requirements, asset limits apply but securities holding limits do not apply.

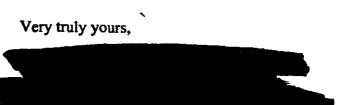
ad, as of December 31, 2000, assets of \$37,679,510.

Id, as of December 31, 2000, assets of \$180,726,061. Both credit unions are engaged in commerce as defined by 15 H S C & 18a. Regulatory approval of the merger has been granted by the 1 Regulatory approval of the merger by the Utah Department of Financial Institutions is pending.

According to 15 U.S.C. § 18(a)a, no person shall acquire the assets of another person unless notification requirements have been met if the acquisition meets certain requirements. Notification is not required if the assets of the acquired person are not in excess of \$50,000,000.

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Because assets are less than \$50,000,000, we believe that formal notification to the FTC is not required. If we are correct in our analysis that this merger is exempt, please so advise us. If we are not correct, we would likewise appreciate your so advising us so that the Premerger notification requirements can be met.





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B. mchl Jan 8/29/01